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053/0531/052



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10

1200 Sixth Avenue, Suite 900  
Seattle, Washington 98101-3140

January 29, 2009

Reply To: ECL-113

John Hatmaker LS1 629  
Tronox LLC  
P.O. Box 268859  
Oklahoma City, Oklahoma 73126

Dear Mr. Hatmaker:

With this letter I am approving the **Draft Final Addendum 1 Work Plan for the Kerr-McGee Chemical Corporation Superfund Site Tronox Facility Soda Springs Idaho** (Work Plan) dated January 14, 2009. This approval is contingent on having the final version of the Work Plan include the following changes:

1. **Section 3.4, page 32, 4th paragraph.** Include the regression coefficient ( $r^2$ ) for each regression trend line for each data set.
2. **Section 3.4, page 32, 5th paragraph.** Include the confidence level ( $1-\alpha$ ) for the Mann-Kendall test that will be used to accept/reject the null hypothesis (no change in concentrations over time).
3. **Section 3.4, page 32, 5th paragraph.** Data suggest that concentrations may be seasonal (cyclical), e.g. concentrations may vary with water level elevation. If data are seasonal, then a "Seasonal Kendall Test" should be applied if the seasonality can be adequately discerned. Note that a semi-annual sampling frequency may not be sufficient to adequately characterize the seasonality of the data. The Work Plan should be revised to indicate if data will be evaluated on a seasonal basis.

With this approval, I request that the final Work Plan be prepared and submitted to EPA and IDEQ. The final Work Plan will serve as the "roadmap" for the work to be completed by Tronox as follow-up to the Five Year Review completed in 2007.

This approval begins the 30 calendar day period within which the draft Remedy Evaluation Report is to be submitted to EPA and IDEQ.

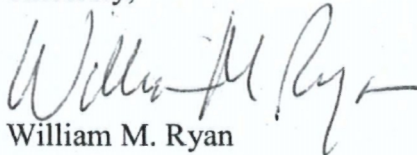
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Should you have any questions, please feel free to call me at (206) 553-8561.

Sincerely,

A handwritten signature in dark ink, appearing to read "William M. Ryan", with a long horizontal flourish extending to the right.

William M. Ryan  
Remedial Project Manager

cc: Boyd Schvaneveldt, Tronox-Soda Springs  
Clyde Cody, IDEQ-Boise  
Doug Tanner, IDEQ-Pocatello